

EXHIBIT A



**AFTAB PUREVAL
HAMILTON COUNTY CLERK OF COURTS**

COMMON PLEAS DIVISION

**ELECTRONICALLY FILED
October 20, 2020 02:48 PM
AFTAB PUREVAL
Clerk of Courts
Hamilton County, Ohio
CONFIRMATION 997401**

TRACEY WILEY

A 2003679

vs.

DOLLAR TREE STORES INC

FILING TYPE: CLASSIFICATION

PAGES FILED: 1

EFR200



COURT OF COMMON PLEAS
HAMILTON COUNTY, OHIO

CLASSIFICATION FORM
WWW.COURTCLERK.ORG

AFTAB PUREVAL
CLERK OF COURTS

CASE NUMBER: _____ PLAINTIFF: Tracey Wiley

PURSUANT TO SUPERINTENDENCE RULE 4, THIS CASE WAS ORIGINALLY FILED AND DISMISSED

UNDER CASE NUMBER: _____ BY JUDGE _____

PLEASE INDICATE CLASSIFICATION INTO WHICH THIS CASE FALLS (please only check one):

- | | |
|--|---|
| <input type="checkbox"/> Other Tort – C360 | <input type="checkbox"/> Other Civil – H700-34 |
| <input checked="" type="checkbox"/> Personal Injury – C310 | <input type="checkbox"/> Appropriation – H710 |
| <input type="checkbox"/> Wrongful Death – C320 | <input type="checkbox"/> Accounting – H720 |
| <input type="checkbox"/> Vehicle Accident – C370 | <input type="checkbox"/> Beyond Jurisdiction – 730 |
| <input type="checkbox"/> Professional Tort – A300 | <input type="checkbox"/> Breach of Contract – 740 |
| <input type="checkbox"/> Personal Injury – A310 | <input type="checkbox"/> Cancel Land Contract – 750 |
| <input type="checkbox"/> Wrongful Death – A320 | <input type="checkbox"/> Change of Venue – H760 |
| <input type="checkbox"/> Legal Malpractice – A330 | <input type="checkbox"/> Class Action – H770 |
| <input type="checkbox"/> Medical Malpractice – A340 | <input type="checkbox"/> Convey Declared Void – H780 |
| <input type="checkbox"/> Product Liability – B350 | <input type="checkbox"/> Declaratory Judgment – H790 |
| <input type="checkbox"/> Personal Injury – B310 | <input type="checkbox"/> Discharge Mechanics Lien – H800 |
| <input type="checkbox"/> Wrongful Death – B320 | <input type="checkbox"/> Dissolve Partnership – H810 |
| <input type="checkbox"/> Worker's Compensation | <input type="checkbox"/> CONSUMER SALES ACT (1345 ORC) – H820 |
| <input type="checkbox"/> Non-Compliant Employer – D410 | <input type="checkbox"/> Check here if relief includes declaratory judgment, injunction or class action recovery – H825 |
| <input type="checkbox"/> Appeal – D420 | <input type="checkbox"/> Habeas Corpus – H830 |
| <input type="checkbox"/> Administrative Appeals – F600 | <input type="checkbox"/> Injunction – H840 |
| <input type="checkbox"/> Appeal Civil Service – F610 | <input type="checkbox"/> Mandamus – H850 |
| <input type="checkbox"/> Appeal Motor Vehicle – F620 | <input type="checkbox"/> On Account – H860 |
| <input type="checkbox"/> Appeal Unemployment – F630 | <input type="checkbox"/> Partition – H870 |
| <input type="checkbox"/> Appeal Liquor – F640 | <input type="checkbox"/> Quiet Title – H880 |
| <input type="checkbox"/> Appeal Taxes – F650 | <input type="checkbox"/> Replevin – H890 |
| <input type="checkbox"/> Appeal Zoning – F660 | <input type="checkbox"/> Sale of Real Estate – H900 |
| <input type="checkbox"/> Certificate of Qualification – H600 | <input type="checkbox"/> Specific Performance – 910 |
| | <input type="checkbox"/> Restraining Order – H920 |
| | <input type="checkbox"/> Testimony – H930-21 |
| | <input type="checkbox"/> Environmental – H940 |
| | <input type="checkbox"/> Cognovit – H950 |
| | <input type="checkbox"/> Menacing by Stalking – H960 |
| | <input type="checkbox"/>] Repo Title – Transfer of Title Only – 970 |
| | <input type="checkbox"/>] Repo Title – With Money Claim – H980 |
| | <input type="checkbox"/> Injunction Sexual Predator – 990 |
| | <input type="checkbox"/> SB 10 – Termination – H690 |
| | <input type="checkbox"/> SB 10 – Reclassification – H697 |

DATE: 10/20/2020

ATTORNEY (PRINT): Stephanie L. Collins

OHIO SUPREME COURT NUMBER: 0089945



**AFTAB PUREVAL
HAMILTON COUNTY CLERK OF COURTS**

COMMON PLEAS DIVISION

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Hamilton County, Ohio
CONFIRMATION 997401**

TRACEY WILEY

A 2003679

vs.

DOLLAR TREE STORES INC

**FILING TYPE: INITIAL FILING (IN COUNTY) WITH NO JURY
DEMAND**

PAGES FILED: 4

EFR200



VERIFY RECORD

**HAMILTON COUNTY COMMON PLEAS COURT
HAMILTON COUNTY, OHIO**

TRACEY WILEY
1105 Virescent Court
Cincinnati, OH 45224

Plaintiff,

vs.

DOLLAR TREE STORES, INC.
887 Galbraith Road
Cincinnati, Ohio 45231

Please Serve Statutory Agent
Corporation Service Company
50 West Broad Street
Suite 1330
Columbus, Ohio 43215

and

UNITED HEALTHCARE SERVICES INC.:
Please Serve Statutory Agent:
CT CORPORATION SYSTEM
4400 Easton Commons Way
Suite 125
Columbus Oh 43219

Defendants.

Case No.:

(Judge:)

COMPLAINT

Now comes the Plaintiff, by and through counsel, and as and for her Complaint against Defendants states as follows:

1. Plaintiff, Tracey Wiley, resides at 1105 Virescent Court, Cincinnati, Ohio 45224 and has so resided at all times relevant herein.

2. Defendant, Dollar Tree Stores, Inc., licensed to do business in the State of Ohio and a business operation with a store location at 887 Galbraith Road, Cincinnati, Ohio 45505.

3. All occurrences, which form the basis of this complaint, occurred within Clark County, Ohio.

COUNT ONE

4. Plaintiff hereby incorporates by reference Paragraphs one through three as though fully rewritten herein.

5. On or about October 21, 2018, Defendant, Dollar Tree Stores, Inc. owned and/or operated a building at 887 Galbraith Road, Cincinnati, Hamilton County, Ohio 45231.

6. At all times relevant herein, Plaintiff, Tracey Wiley, was a lawful invitee on said premises.

7. At all times relevant herein, Defendant, Dollar Tree Stores, Inc., through its agents, servants and employees, negligently and carelessly created and/or permitted a hazardous condition to exist in the form of boxes falling inside their place of business.

8. Defendant, Dollar Tree Stores, Inc. I, knew or should have reasonably known of said dangerous condition.

9. Defendant, Dollar Tree Stores, Inc., failed to warn or make safe known dangerous condition.

10. As a direct and proximate result of Defendant Dollar Tree Stores, Inc.'s negligence, Plaintiff was injured on said date.

11. As a direct and proximate result of Defendant, Dollar Tree Stores, Inc., Plaintiff suffered bodily injuries and reasonably believes these injuries to be permanent.

12. As a direct and proximate result of Defendant Dollar Tree Stores, Inc.'s negligence, Plaintiff, Tracey Wiley, experienced severe pain and suffering and reasonably expects to experience additional pain and suffering in the future.

13. As a direct and proximate result of Defendant Dollar Tree Stores, Inc.'s negligence, Plaintiff, Tracey Wiley, experienced loss of enjoyment of life and reasonably expects to experience additional loss of enjoyment of life in the future.

14. As a direct and proximate result of Defendant Dollar Tree Stores, Inc.'s negligence, Plaintiff, Tracey Wiley, incurred reasonable and necessary medical expenses and reasonably expects to incur additional medical expense in the future.

15. Plaintiff, Tracey Wiley is entitled to judgment in an amount yet to be determined, but in excess of Twenty-Five Thousand Dollars (\$25,000.00), as and for compensatory damages.

COUNT TWO

16. Plaintiff hereby incorporates by reference paragraphs one through fifteen as though fully rewritten herein.

17. Plaintiff, Tracey Wiley, had health insurance with Defendant United Healthcare Services on the date of the above-described accident.

18. As a result of the above-described accident, and pursuant to the health insurance held with Plaintiff, Tracey Wiley, Defendant United Healthcare Services will pay, should pay, did pay, or may have paid some of the Plaintiff's medical bills from the instant accident.

19. Pursuant to the terms of said policy, United Healthcare Services is or may be subrogated to a portion of Plaintiff, Tracey Wiley's claims against Defendant, Dollar Tree Stores, Inc., and should be required to assert its interests or otherwise be forever barred from doing so as to any party hereto.

20. Plaintiff, Tracey Wiley, demands that Defendant, United Healthcare Services, pay her medical bills and assert any interest said Defendant may have in the instant matter or otherwise be forever barred in doing so as to any party hereto.

WHEREFORE, Plaintiff, Tracey Wiley, prays for judgment against Defendant, Dollar Tree Stores, Inc., in an amount yet to be determined, but in excess of Twenty-Five Thousand Dollars (\$25,000.00), as and for compensatory damages; Plaintiff prays that United Healthcare be required to assert any interest said Defendant may have in the instant matter or otherwise be forever barred from doing so as to any party hereto; Plaintiff further prays for all relief to which she may be entitled at law and/or equity, including pre-judgment interest.

Respectfully Submitted,

/s/ Stephanie L. Collins

Stephanie L. Collins (OH Bar# 0089945)
The Law Offices of Blake R. Maislin, LLC
Maislin Professional Center
2260 Francis Lane
Cincinnati, OH 45206
Tel 513-444-4444
Fax 513-721-5557
scollins@maislinlaw.com
Counsel for the Plaintiff, Tracey Wiley

INSTRUCTIONS TO CLERK

Please serve the Complaint upon all Defendants at the addresses identified in the caption.

/s/ Stephanie L. Collins

Stephanie L. Collins (OH Bar# 0089945)

COURT OF COMMON PLEAS
HAMILTON COUNTY, OHIO

TRACEY WILEY
PLAINTIFF

-- vs --

DOLLAR TREE STORES INC
DEFENDANT

Use below number on
all future pleadings

No. A 2003679
SUMMONS

DOLLAR TREE STORES INC
SERVE CORPORATION SERVICE COMPANY D - 1
50 WEST BROAD ST STE 1330
COLUMBUS OH 43215

You are notified
that you have been named Defendant(s) in a complaint filed by

TRACEY WILEY
1105 VIRESCENT COURT
CINCINNATI OH 45224

Plaintiff(s)

in the Hamilton County, COMMON PLEAS CIVIL Division,
AFTAB PUREVAL, 1000 MAIN STREET ROOM 315,
CINCINNATI, OH 45202.

You are hereby summoned and required to serve upon the plaintiff's attorney, or upon the plaintiff, if he/she has no attorney of record, a copy of an answer to the complaint within twenty-eight (28) days after service of this summons on you, exclusive of the day of service. Your answer must be filed with the Court within three (3) days after the service of a copy of the answer on the plaintiff's attorney.

Further, pursuant to Local Rule 10 of Hamilton County, you are also required to file a Notification Form to receive notice of all future hearings.

If you fail to appear and defend, judgement by default will be rendered against you for the relief demanded in the attached complaint.

Name and Address of attorney
STEPHANIE COLLINS
2260 FRANCIS LANE
CINCINNATI OH 45206

AFTAB PUREVAL
Clerk, Court of Common Pleas
Hamilton County, Ohio

By RICK HOFMANN Deputy

Date: October 21, 2020



D130110483



VERIFY RECORD

COURT OF COMMON PLEAS
HAMILTON COUNTY, OHIO

TRACEY WILEY
PLAINTIFF

-- vs --

DOLLAR TREE STORES INC
DEFENDANT

Use below number on
all future pleadings

No. A 2003679
SUMMONS

UNITED HEALTHCARE SERVICES INC
SERVE CT CORPORATION SYSTEM
4400 EASTON COMMONS WAY STE 125
COLUMBUS OH 43219

D - 2

You are notified
that you have been named Defendant(s) in a complaint filed by

TRACEY WILEY
1105 VIRESCENT COURT
CINCINNATI OH 45224

Plaintiff(s)

in the Hamilton County, COMMON PLEAS CIVIL Division,
AFTAB PUREVAL, 1000 MAIN STREET ROOM 315,
CINCINNATI, OH 45202.

You are hereby summoned and required to serve upon the plaintiff's attorney, or upon the plaintiff, if he/she has no attorney of record, a copy of an answer to the complaint within twenty-eight (28) days after service of this summons on you, exclusive of the day of service. Your answer must be filed with the Court within three (3) days after the service of a copy of the answer on the plaintiff's attorney.

Further, pursuant to Local Rule 10 of Hamilton County, you are also required to file a Notification Form to receive notice of all future hearings.

If you fail to appear and defend, judgement by default will be rendered against you for the relief demanded in the attached complaint.

Name and Address of attorney
STEPHANIE COLLINS
2260 FRANCIS LANE
CINCINNATI OH 45206

AFTAB PUREVAL
Clerk, Court of Common Pleas
Hamilton County, Ohio

By RICK HOFMANN Deputy

Date: October 21, 2020



D130110485



VERIFY RECORD



ELECTRONIC CERTIFIED MAIL SERVICE RETURN
SUMMONS & COMPLAINT
A 2003679 D2
UNITED HEALTHCARE SERVICES INC
FILED: 10/26/2020 6:53:44

Date Produced: 10/26/2020

HAMILTON COUNTY CLERK OF COURTS:

The following is the delivery information for Certified Mail™ item number 7194 5168 6310 0928 5713. Our records indicate that this item was delivered on 10/24/2020 at 12:03 p.m. in COLUMBUS, OH 43224. The scanned image of the recipient information is provided below.

Signature of Recipient :

Delivery Section
Signature: *[Handwritten Signature]*
Name: DANIEL D KEUGY

Address of Recipient :

4400 Easton Ste 125
Comm.

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

Customer Reference Number: 15885595SEQ1




ELECTRONIC CERTIFIED MAIL SERVICE RETURN
SUMMONS & COMPLAINT
A 2003679 D1
DOLLAR TREE STORES INC
FILED: 11/02/2020 6:54:14

Date Produced: 11/02/2020

HAMILTON COUNTY CLERK OF COURTS:

The following is the delivery information for Certified Mail™ item number 7194 5168 6310 0928 5706. Our records indicate that this item was delivered on 10/26/2020 at 11:52 a.m. in COLUMBUS, OH 43215. The scanned image of the recipient information is provided below.

Signature of Recipient :


CSL Lawyers

Address of Recipient :

50 W Main St 1330

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

Customer Reference Number: 15885593SEQ1